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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON
AT YAKIMA**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, et al.,

Defendants.

NO. 1:20-cv-03127-SAB

SUPPLEMENTAL
DECLARATION OF
ANDREW R.W. HUGHES IN
SUPPORT OF PLAINTIFFS'
MOTION FOR
PRELIMINARY
INJUNCTION

NOTED FOR: September 17,
2020 at 10:00 a.m.
With Oral Argument

1 I, ANDREW R.W. HUGHES, declare and affirm:

2 1. I am an Assistant Attorney General with the Washington State
3 Office of the Attorney General. I have personal knowledge of the matters stated
4 herein, and if called as a witness, I would testify competently to this information.

5 2. Attached as Exhibit DD is a true and correct copy of a PDF image
6 of the webpage *Service Alerts* on USPS.com, available at
7 <https://about.usps.com/newsroom/service-alerts/>. This image was captured by
8 my office on September 15, 2020.

9 3. Attached as Exhibit EE is a true and correct copy of a July 14, 2020
10 email from Robert Cintron, USPS's Vice President of Logistics, which was
11 produced as part of Defendants' discovery responses in this litigation. This email
12 begins at Bates No. USPS00000216.

13 4. Attached as Exhibit FF is a true and correct copy of the Testimony
14 of S. David Fineman before the House Committee on Oversight and Reform
15 (Sept. 11, 2020), available at <https://bit.ly/32Amdfr>.

16 5. Attached as Exhibit GG is a true and correct copy of a PDF version
17 of the Excel spreadsheet of service performance data for market-dominant
18 products for the weeks of January 4, 2020 through August 22, 2020. Defendants
19 produced the native Excel version as part of their discovery responses in this
20 litigation at Bates No. USPS00002260. The attached PDF image of the native file
21 was created by my office on September 16, 2020.

22 6. Attached as Exhibit HH is a true and correct copy of a USPS
23 document entitled *Quarterly Performance for Single-Piece First Class Mail* for
24 Quarter III, FY2020, available at <https://bit.ly/3c6KHjy>.

1 I declare under penalty of perjury of the laws of Washington that the
2 foregoing is true and correct.

3 DATED this 16th day of September, 2020.

4
5 s/Andrew R.W. Hughes

6 ANDREW R.W. HUGHES, WSBA #49515

7 Assistant Attorney General

8 Complex Litigation Division

9 Attorney General's Office of Washington
10 State

DECLARATION OF SERVICE

I hereby declare that on this day I caused the foregoing document to be electronically filed with the Clerk of the Court using the Court's CM/ECF System which will serve a copy of this document upon all counsel of record.

DATED this 16th day of September, 2020, at Tumwater, Washington.

/s/ Jennifer D. Williams

JENNIFER D. WILLIAMS
Paralegal